

LAW OFFICES OF JEROME M. DOUGLAS, LLC

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**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

In re:

**PILGRIM MEDICAL CENTER, INC.,
AND NICHOLAS V. CAMPANELLA,**

Debtor.

Case No. 16-15414 (VFP)
(Jointly Administered)

Chapter 11

Hon. Judge: Vincent F. Papalia

Hearing Date: 08/08/2017 @ 10:00 am

*Oral Argument Not Requested Unless Timely
Obj. Made*

**NOTICE OF MOTION ENTRY OF ORDERS (A) AUTHORIZING
THE SALE OF REAL PROPERTY LOCATED AT 101 BEACON
BOULEVARD, SEA GIRT, NEW JERSEY FREE AND CLEAR OF
INTERESTS, CLAIMS, LIENS AND ENCUMBRANCES; (B)
AUTHORIZING COMPENSATION TO RETAINED
PROFESSIONALS FOR APPROVED FEES AND COSTS FROM SALE
PROCEEDS; AND (C) WAIVING THE FOURTEEN-DAY STAY**

PLEASE TAKE NOTICE that the Debtor will move before the Honorable Vincent F. Papalia, United States Bankruptcy Judge, on August 8, 2017 at 10:00 a.m. at the United States Bankruptcy Court, 50 Walnut Street, Newark New Jersey 07102, for Entry of Orders (a) authorizing the sale of real property located at 101 Beacon Boulevard, Sea Girt, New Jersey (the "Property") free and clear of interests, claims, liens and encumbrances SUBJECT TO HIGHER OR BETTER OFFERS (the "Sale"); (b) authorizing compensation to retained professionals for approved fees and costs from sale proceeds; and (c) waiving the fourteen-day stay provided for in Federal Rules of Bankruptcy Procedure 6004(h); and

PLEASE TAKE FURTHER NOTICE that in support of the motion, the undersigned will rely on the certification of Nicholas V. Campanella and Pamela Farmer submitted herein; and

PLEASE TAKE FURTHER NOTICE that any answering papers or objections to the Debtor's motion must be filed and served at least seven (7) days before the return date of this motion. If you wish to object to this motion, you must file responding papers stating with particularity the basis of your objection to the motion. All such responsive papers must be filed with the Clerk of the Bankruptcy Court for the District of New Jersey, located at 50 Walnut Street, Newark, New Jersey, and served simultaneously upon,

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PLEASE TAKE FURTHER NOTICE that oral argument is only requested if the motion is contested or so directed by the Court; and

PLEASE TAKE FURTHER NOTICE that this matter does not involve complicated issues of law or fact and therefore no brief is necessary.

LAW OFFICES OF JEROME M. DOUGLAS, LLC
Counsel to the Debtor

By: /s/ Jerome M. Douglas
Jerome M. Douglas

Dated: July 14, 2017